

EXHIBIT 85

Declaration of Rachel Gogal

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF RACHEL GOGAL

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I, Rachel Gogal, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I graduated from The University of North Carolina at Chapel Hill (“UNC-Chapel Hill” or “Carolina”) in 2016 with degrees in Public Relations and Political Science. From May 2016-June 2017, I served as a Chancellor’s Fellow, a year-long fellowship in the Office of the Chancellor. I am currently serving as Manager of University Communications for the Office of University Communications. I am offering this declaration to share my perspective as a recent graduate of the University.

2. I am from Garner, North Carolina which is outside of Raleigh. I went to Garner Magnet High School, an International Baccalaureate (“IB”) high school. I came from a lower-performing school, and students who needed to be challenged academically were brought into the IB program. I graduated third in my class of 500 students. Going through an IB program, I was challenged to examine what I was learning on a global scale. It was a great segue to continue that way of thinking during my college career.

3. I applied to UNC-Chapel Hill, The University of North Carolina at Wilmington, and Appalachian State University, but when I got accepted to UNC-Chapel Hill, I knew I wanted to attend. Carolina was my number one choice. My grandfather attended Carolina for undergraduate and law school.

4. When I came to Carolina, I was interested in political communications, but I soon became interested in communications in higher education. I hope to continue pursuing communications in higher education after my Chancellor’s Fellowship ends.

Experience at UNC-Chapel Hill

5. I knew I wanted to get involved in student government at Carolina since I had been in student government in middle school and high school. I started from the bottom of the ladder and worked my way up to Student Body Vice President. I was able to interact with students from different cultures and backgrounds as well as with professional and graduate students. I also served on the Eve Carson Scholarship Committee, and I was an Office Assistant in the Office of Housing and Residential Education. I was involved in intramural sports and played on a soccer team.

6. The biggest mission of student government is not to speak on behalf of students but to elevate students' voices so that their voices are heard by the administration. I often spoke with individuals from groups such as the Black Student Movement and Latino/a Collaborative to better understand their experiences and their needs. I worked to bring those concerns forward.

7. In my capacity as Vice President, I interacted with students of different backgrounds on a daily basis. I was responsible for external appointments, the system by which students are appointed to sit on University committees across the campus. These committees included the University Teaching Awards, the Provost's Committee on Inclusive Excellence and Diversity, Faculty Council, the Committee on Student Conduct, and the Campus Health Advisory Board. Some of these groups touched on the topic of diversity. Representatives to these groups were able to provide different perspectives on diversity and inclusion. I interacted with a variety of students representing the student body who raised their concerns related to diversity and inclusion to me and to the University administration.

8. I also served as the Chair of The Student Advisory Committee to the Chancellor. The committee consisted of ten undergraduate students and three graduate students. Many of our

discussions related to diversity and inclusion. A recent example of an issue that raised concerns about inclusion was the passage of House Bill 2 (“HB2”), an act requiring individuals to only use restrooms and changing facilities in government buildings that correspond to the sex on their birth certificates. We were able to provide the Chancellor with reactions and concerns of the student body about the bill.

9. My education was fueled by the diverse perspectives of students in my classes. I benefitted from hearing the perspectives of others.

10. One significant class I remember where diversity made an impact was a crisis communication class. We discussed real-world crises, and we would have to address those crises as public relations representatives by presenting press conferences on each crisis. In preparation, we focused on current events like HB2. We discussed these topics from an academic and corporate perspective, and we spoke about race, diversity, and inclusion. The class consisted of individuals from a variety of different backgrounds and cultures, which provided important perspectives. Considering real-world, current issues helped us learn how to be better crisis communicators.

11. One of the biggest things I have gained from my higher education experience at Carolina is perspective. I grew up shielded from the world around me. At Carolina, I became exposed to the realities of the world. As a white female, I cannot relate in some ways to a black female’s experiences but now, I am able to have open-minded conversations, understand where people from different backgrounds are coming from, try to help in my capacity to elevate concerns, and drive the conversation.

12. Many students at Carolina are well educated and understand the importance of issues related to diversity and inclusion. When students express concerns, there is intent and

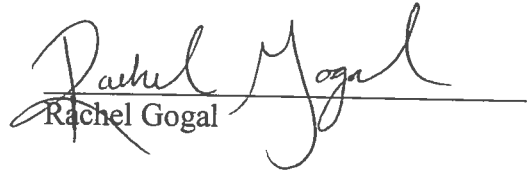
meaning behind those concerns. The University has done a great job of taking those concerns to heart, and I hope the University continues to take those concerns seriously.

Conclusion

13. I am fueled by my deep love of Carolina. I believe diversity is essential to the Carolina experience and to Carolina's excellence.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: 07-06-17


Rachel Gogal